

CRIMINAL COMPLAINT

United States District Court		DISTRICT Eastern District of Pennsylvania	
UNITED STATES OF AMERICA v. Chelsey Cribb		DOCKET NO. MAGISTRATE'S CASE NO. 11-1026	
Complaint for violation of Title 18 United States Code § 1344, 1028A, 1030, 2			
NAME OF JUDGE OR MAGISTRATE Honorable JACOB P. HART		OFFICIAL TITLE U.S. Magistrate Judge	LOCATION Philadelphia, PA
DATE OF OFFENSE October 29 to November 4, 2010	PLACE OF OFFENSE Eastern District of Pennsylvania and elsewhere	ADDRESS OF ACCUSED (if known) 15 Primrose Drive Burlington, New Jersey	

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

From on or about October 29, 2010 to on or about November 4, 2010, defendant Chelsey Cribb knowingly executed, and aided and abetted the execution of, a scheme to defraud a federally insured bank, committed, and aided and abetted, aggravated identity theft, and accessed in excess of authorization the records of a financial institution, in violation of Title 18, United States Code, Sections 1344, 1028A, 1030 and 2.

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

SEE AFFIDAVIT ATTACHED HERETO.

MATERIAL WITNESSES IN RELATION AGAINST THE ACCUSED:

Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.

SIGNATURE OF COMPLAINANT (official title)

Vincent Clancy
Vincent Clancy

OFFICIAL TITLE

Special Agent, United States Secret Service

Sworn to before me and subscribed in my presence:

SIGNATURE OF MAGISTRATE ⁽¹⁾

Honorable JACOB P. HART, United States Magistrate Judge

DATE

7-22-11

⁽¹⁾ See Federal Rules of Criminal Procedure rules 3 and 54.

AFFIDAVIT

I, Vincent Clancy, being duly sworn, depose and state as follows:

1. I am employed as a Special Agent with the United States Secret Service. I have been employed by this agency for three years. I have had three years of experience in the investigation of identity theft offenses. I am presently assigned to the Philadelphia Field office which investigates financial crimes, among other violations of Federal law.

2. The information within this Affidavit is based upon my personal knowledge and observations, as well as information supplied to me by New Jersey law enforcement officers and by TD Bank fraud investigators, as well as review of bank records, bank surveillance photographs, and an interview of defendant Chelsey Cribb. What follows is not all of the information I have uncovered during my investigation.

3. Since 2009, the Secret Service have been conducting an on-going investigation into a bank fraud ring which is targeting banks, including TD Bank, in the Eastern District of Pennsylvania and elsewhere.

4. From fraud investigators with TD Bank, and a review of TD Bank documents and surveillance photographs, I learned that this bank fraud ring recruited TD Bank employees to provide bank account and personal information for TD Bank customers and recruited individuals to conduct fraudulent transactions against the accounts of customers of TD Bank.

5. A TD Bank investigator assigned to investigate a claim of a fraudulent withdrawal of \$6,000 on November 4, 2010 from the TD Bank account of J.C., determined through the TD Bank computer system that TD Bank teller Chelsey Cribb had accessed this account with no legitimate business reason to do so on October 29, 2010, and had processed the \$6,000 fraudulent withdrawal at a drive-in window of the TD Bank branch at 13 Levitt Parkway, Willingboro, New Jersey on November 4, 2010.

6. I, as well as New Jersey law enforcement officers, interviewed Chelsey Cribb, who admitted to participation in the bank fraud and identity theft scheme and to having been recruited to participate in the scheme at a club in Philadelphia, Pennsylvania by an individual she later identified as Kashon Adade, who has been charged elsewhere.

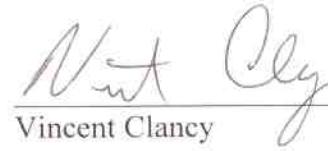
7. Cribb admitted to being paid \$500 by Adade to provide account information and an account password for TD Bank customer J.C.

8. Cribb also admitted processing the \$6,000 fraudulent withdrawal against the TD Bank account of J.C. while she was working as a teller at a drive-in window at the TD Bank Willingboro, New Jersey branch on November 4, 2010.

9. Per TD Bank, defendant Chelsey Cribb did not have authorization to access the TD Bank computer system and observe financial records of TD Bank customer J.C. for the purpose of taking TD Bank customer personal or account information.

10. At the time of these offenses, TD Bank was a federally insured financial institution doing business in interstate commerce.

11. Based on the above facts, there is probable cause to believe that Chelsey Cribb executed, and aided and abetted the execution of, bank fraud, in violation of 18 U.S.C. §§ 1344 and 2, committed, and aided and abetted, aggravated identity theft, in violation of 18 U.S.C. §§ 1028A and 2, and accessed, in excess of authorization, the records of a financial institution,, in violation of 18 U.S.C. § 1030(a)(2).



Vincent Clancy
Special Agent
United States Secret Service

Sworn and Subscribed before me
this 22 of July, 2011



HONORABLE JACOB P. HART
United States Magistrate Judge